



Freshfields Bruckhaus Deringer US LLP

DAVID LIVSHIZ

NEW YORK
601 Lexington Avenue
31st Floor
New York, NY 10022

T + 1 212 277 4000

Direct T + 1 212 284 4979

F + 1 212 277 4001

Direct F + 1 646 521 5779

E david.livshiz@freshfields.com

W www.freshfields.com

The Honorable Andrew L. Carter, Jr.
United States District Court
Southern District of New York
40 Foley Square, Courtroom 1306
New York, New York 10007

By ECF and Email

November 3, 2015

Re: In re Lehman Bros. Holdings Inc., 15-cv-08052 (ALC)

Dear Judge Carter:

We represent Shield Securities Ltd. (*Shield*), in the above captioned action. Pursuant to Your Honor's individual practices, due to a tragedy today at our law firm, we write to request an extension to file our Reply in further support of our Motion for Leave to Appeal until Tuesday, November 10, 2015.

Shield's Reply was originally due on November 5, 2015. This is Shield's first request for an extension of time with respect to this motion, and it is made with LBSF's consent. Accordingly, we respectfully request that the Court so-order the stipulation annexed hereto as Exhibit A which provides that Shield will file its Reply on November 10, 2015.

Respectfully submitted,



David Livshiz

cc: Paul DeFilippo, Esq. (by email)
William F. Dahill, Esq. (by email)
Joanna Schorr, Esq. (by email)

EXHIBIT A

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

| | | |
|--|---|------------------------------|
| _____ | X | |
| | : | Chapter 11 |
| In re: | : | |
| | : | Case No. 08-13555 (SCC) |
| LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> , | : | |
| | : | |
| Debtors. | : | |
| _____ | X | |
| LEHMAN BROTHERS SPECIAL FINANCING INC., | : | |
| | : | |
| Plaintiff, | : | |
| | : | |
| -against- | : | Adversary Proceeding |
| | : | No. 10-03547 (SCC) |
| BANK OF AMERICA NATIONAL ASSOCIATION, | : | |
| <i>et al.</i> , | : | |
| Defendants. | : | |
| _____ | X | |
| SHIELD SECURITIES LIMITED, | : | 15-cv-08052 (ALC) |
| | : | |
| Appellant, | : | On Appeal from the United |
| | : | States Bankruptcy Court |
| -against- | : | for the Southern District of |
| | : | New York, Honorable |
| LEHMAN BROTHERS SPECIAL FINANCING INC., | : | Shelley C. Chapman, |
| | : | Adv. Pro. No. 10-03547 |
| Appellee. | : | |
| _____ | X | |

STIPULATION

WHEREAS, the Bankruptcy Court entered the Order Concerning Shield Securities Limited (“Shield”)’s Motion to Dismiss for Lack of Personal Jurisdiction (the “Order”) (ECF No. 1148) on September 28, 2015;

WHEREAS, on October 5, 2015 Shield filed a Notice of Appeal (ECF No. 1);

WHEREAS, accompanying the Notice of Appeal, Shield moved for leave to appeal the Order (the “Motion”) (ECF No. 4), accompanied by the Memorandum of Law in Support of

Shield's Motion (ECF No. 6) and the Declaration of Shannon M. Leitner (ECF No. 5);

WHEREAS, on October 15, 2015, Lehman Brothers Special Financing Inc. ("LBSF") filed an unopposed letter motion extending the time for LBSF to file its Opposition to October 26, 2015 and Shield's time to file its Reply to November 5, 2015, which the Court so ordered on October 16, 2015 (ECF No. 8);

WHEREAS, on October 26, 2015, LBSF filed its Opposition to Shield's Motion for Leave to Appeal, along with the Declaration of William F. Dahill (ECF No. 11);

IT IS HEREBY STIPULATED AND AGREED, by and between LBSF and Shield, by their respective undersigned counsel, as follows:

1. The deadline for Shield to file its Reply to LBSF's Opposition is hereby extended to November 10, 2015.
2. Shield reserves all rights and defenses it may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction (including, for the avoidance of doubt, objections to the exercise of in personam jurisdiction over Shield and the exercise of in rem jurisdiction over the subject matter of this dispute).

Dated: November 3, 2015
New York, New York

FRESHFIELDS BRUCKHAUS
DERINGER US LLP



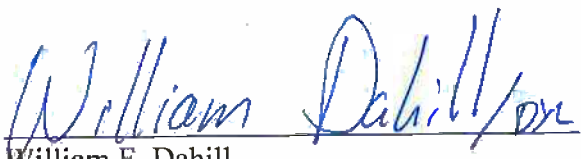
Timothy P. Harkness
timothy.harkness@freshfields.com
David Livshiz
david.livshiz@freshfields.com
601 Lexington Avenue, 31st Floor
New York, New York 10022
Telephone: (212) 277-4000
Facsimile: (212) 277-4001

*Attorneys for Appellant Shield Securities
Limited*

IT IS SO-ORDERED:

November __, 2015
New York, New York

WOLLMUTH MAHER & DEUTSCH LLP



William F. Dahill
wdahill@wmd-law.com
Adam M. Bialek
abialek@wmd-law.com
500 Fifth Avenue
New York, New York 10110
Telephone: (212) 382-3300
Facsimile: (212) 382-0050

*Attorneys for Appellee Lehman Brothers
Special Financing Inc.*

HONORABLE ANDREW L. CARTER, JR.
UNITED STATES DISTRICT JUDGE